

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MARTIN J. WALSH,	)	
SECRETARY OF LABOR,	)	
UNITED STATES DEPARTMENT OF LABOR	)	
Plaintiff,	)	
v.	)	
	)	Civil Docket No.: 2:21-cv-01565-CB
RELIABLE HOME HEALTH, LIMTED, D/B/A	)	
RELIABLE HOME HEALTH, and )	)	<b>NOTICE OF MOTION</b>
ALI MOHAMED,	)	
	)	
	)	
Defendants.	)	
_____	)	

COMES NOW Hang & Associates, PLLC ("H&A"), hereby files this renewed motion before this Court at the United States District Court for the Western District of Pennsylvania, located at 700 Grant Street, Pittsburgh, PA 15219, before the Honorable Cathy Bissoon, at time and date to designated by the Court, for the following relief:

1. pursuant to Local Civil Rule 83.2, granting leave for Hang & Associates, PLLC to withdraw appearance as counsel of record for Defendants RELIABLE HOME HEALTH, LIMTED, D/B/A RELIABLE HOME HEALTH, and ALI MOHAMED, in the above captioned matter;

2. extending Defendants' time to respond to Plaintiff's motion for summary judgement by 2 weeks, through January 27, 2023; and
3. Any other and such relief the Court deems just and proper.

In support of this motion, undersigned counsel attaches the Declaration of Attorney Ge Qu filed herewith, which, it is averred, satisfied the requirements of the foregoing Local Rules.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's Individual Rules, any opposing affidavits and answering memorandum of law must be served within eleven (11) calendar days of service.

Respectfully Submitted,

HANG & ASSOCIATES, PLLC

Dated: December 30, 2022  
Flushing, New York

s/ Ge Qu  
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